

April 16, 2012

**VIA ECFS**

James Arden Barnett, Jr., Chief  
Public Safety & Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
*(And to Interested FCC Staff; and General Public)*

Re: Petition for Review in Proceeding 12-52, Proceeding 08-146, and Proceeding 07-287 – “Certain Wireless Service Interruptions” / “CMS Licensees” / “In the Matter of the Commercial Mobile Alert System”: Waiver Request

Dear Mr. Barnett:

I am filing this request to support a brief extension of time, to May 15, 2012, of the April 7, 2012 deadline described for the implementation of the CMAS (Commercial Mobile Alert System) for certain carriers (who have requested such an extension in proceeding 08-146) and for rural wireless telecommunications providers, a longer extension to June 5, 2012 (who have requested such an extension in proceeding 07-287) to comply with the Commission’s rules. I believe that this process of the CMAS has bearing on Proceeding 12-52, but do not request an extension of time for comments in proceeding 12-52. Realizing that other petitions have already been submitted in connection with proceedings 08-146 and 07-287 that also request an extension of time, please accept this request and petition for review also for the reasons below .

I note that various cell service providers are not opting out of the CMAS and that FEMA, the DHS, the cell service providers, and third party service providers have been in communication with each other as to how to address and deploy the CMAS. I have also noticed that some providers have submitted a sixty-day notice of intent to withdraw from the CMAS and / or have submitted notice that they will not be participating in the CMAS. It therefore appears that this whole process may take more time than has previously been anticipated, thus the May 15, 2012 date requested.

In addition, I wish to express my concern in this petition that the CMAS process may be used to attempt to create a justification for cellular “discontinuance,” “shutoff,” or “modification” options outside the realm of Proceeding 12-52. It is hoped that discussion or presentation on the issue of wireless service interruptions be directed into the FCC’s Proceeding 12-52. Filings in proceeding 12-52 are requested to be used for rulemaking favorable to the public interest ~ specifically, that which is favorable to the public’s use of networks without disruption and interruption of the same from government actors.

Respectfully,

Colin G. Gallagher